

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

HEBRON AUTO SALES, an Illinois Corporation,

Plaintiff,  
v.

Case No. 07 L 008984

ZAK MOHAMMED, an Individual,  
ALLSTAR HAULING a/b/a ALLSTAR  
AUTOMOTIVE

Defendant.

## INITIAL STATUS REPORT BY PLAINTIFF'S COUNSEL

NOW COMES the Plaintiff, HEBRON AUTO SALES, by and through its attorneys,  
LAW OFFICES OF MICHAEL E. REDIGER, P.C., and in support of its Initial Status Report  
states as follows:

## THE NATURE OF THE CASE

1. That the attorney of record for the Plaintiff is the Law Offices of Michael E. Rediger, P.C., 217 N. Jefferson, Suite 602, Chicago, Illinois 60661. Defendants have not yet been served in this action and thus, to date, there are no attorneys of record for the Defendants.

2. That this Honorable Court is vested with diversity jurisdiction pursuant to 28 U.S.C. 1332(a)(2) in that the matter in controversy exceeds the sum or value of \$75,000.00 and involves citizens of different states.

3. That Plaintiff seeks monetary damages against the Defendants and alleges three counts in support thereof, including 1) breach of contract, 2) conversion, 3) replevin. All counts involved a quantity of eight (8) automobiles that Defendants failed to deliver from the Greater Chicago Auto Auction to Baltimore Port for export. At this time, there are no anticipated counterclaims.

4. That to date, Defendants ZAK MOHAMMED and ALLSTAR HAULING a/b/a ALLSTAR AUTOMOTIVE have not yet been served. After service attempts on the Defendants were unsuccessful, Plaintiff hired NIS Consulting Group, Ltd. to conduct a locate investigation on Defendants. Defendant ZAK MOHAMMED is associated with six other names and five different addresses. Plaintiffs are actively attempting to locate and serve Defendants.

5. The principle legal issues involved in this case are for breach of contract and conversion. Defendants entered into a contract in which they would deliver eight cars for export on behalf of the Plaintiff. Defendant failed to deliver the Plaintiff's cars as required by the contract, and instead stole the cars for his own use.

6. The factual issues involved in this case are that the Defendant stole eight of Plaintiff's cars in stead of delivering them to the Baltimore Port for export and it is unknown where the cars are currently being held.

### **DISCOVERY**

7. Plaintiffs have not sought a jury trial for the resolution of this matter.

8. To date, there has been no discovery entered into between the parties. However, it is expected that Plaintiff will take both written and oral discovery of the Defendant to locate the whereabouts of its property.

9. Additionally, there are no pending motions at this time.

### **TRIAL**

10. To date, it is unknown when the earliest date for the trial will be as Plaintiff is still attempting to serve the Defendants.

**SETTLEMENT**

11. To date, there have been no settlement conferences in this cause.

Respectfully submitted,

HEBRON AUTO SALES

s:/ Michael E. Rediger

By: \_\_\_\_\_  
Attorney for Plaintiff

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